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**Subject: Fw: Comments on Proposed Amendments to the CEQA Guidelines**

Thank you for the opportunity to comment on the proposed amendments to the CEQA Guidelines. EMC Planning Group Inc. has been assisting agencies with CEQA compliance for 30 years. The following comments are a combination of comments from our senior staff members.

1. Page 3, Section 15064 (h)(3). Could we add "traffic impact fee program" to this list of plans/programs?
2. Page 4, Section 15064.4 (a)(1)
  - a. Would a 2020 limit describe with specificity the expectations for reductions expected from all forms of development or projects that are subject to CEQA? How is consistency determined for individual project or plan types? There is no way to determine consistency if the "limit" isn't disaggregated to identify expectations for individual activities or project types. Would the limit be expressed in percentage reduction in GHG volume relative to some baseline for individual activities or project types?
  - b. Might there be more than one 2020 limit? Reword to, "...consistent with a statewide 2020 greenhouse gas emissions limit if adopted and if applicable to a project subject to CEQA or with a plan, program, or regulation.....". Could there be inconsistencies between expectations based on a 2020 limit versus expectations described in a plan, program or regulation?
3. Page 4, Section 15064.4(a)(4): Are (1) and (4) contradictory? If a project helps attain – is that a defacto threshold? Would "any threshold" described in (4) have to be consistent with (1)? If not, against which measure is significance supposed to be evaluated?
4. Page 14, Section 15130 (b)(1)(B). Could we add "specific plan" to this list of adopted local or regional plans?
5. Page 15, Section 15130 (e). Could we add "specific plan" to this list, as well?
6. Page 15, Section 15130, new subsection (f). This proposed subsection seems unnecessary. Why would we make this statement about greenhouse gas emissions and not about every other environmental issue required to be addressed in the CEQA process? Why differentiate climate change separate from other cumulative effects? This comment applies

to a number of suggested changes. If climate change is part of the checklist, then climate change effects will/must be treated as any other potential effect under CEQA.

7. Page 19, Section 15152(i): Not necessary. Already covered in 151305. Appendix G, page 5, II Agricultural and Forest Resources. It's not clear why adding forest resources to Agriculture Resources is proposed. Is this addressing greenhouse gases only or is the proposal to address the conversion of forest products to urban development? Or is this about the loss of forests due to logging? Much clarification is necessary if these proposed changes are adopted.

8. Page 21, Section 15183(g): Should specify examples such as a green building ordinance or other ordinance designed to reduce greenhouse gas emissions. Current statement is too broad for the class of examples provided prior to it.

9. Appendix G, page 7, Geology & Soils (d). This is just a clean up item. Can we change this questions to read, "Be located on expansive soil, as defined in the current version of the California Building Code, creating substantial risks to life or property?"

10. Appendix G, page 7, VII. Greenhouse Gas Emissions. In item a) why is the phrase "based on any applicable threshold of significance?" included? If this phrase is appropriate here, it would be appropriate at the end of every question in the checklist.

11. Appendix G, page 11, XVI. Transportation/Traffic. It's not clear why the changes are proposed. I agree that "b" is unnecessary, but the changes to "a" and "f" seem unnecessary.

12. Appendix G, page 11, XVII, Utilities and Service Systems. Since it appears that some of the proposed changes are not related to greenhouse gas emissions, attached are some recommended changes to this Utilities and Service Systems.

Thank you for considering our comments:

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and

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